

# EXHIBIT D

**Dolores M. Troiani**

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**From:** Dolores M. Troiani <dmT@TGLawoffice.com>  
**Sent:** Monday, July 20, 2015 10:31 AM  
**To:** 'O'Connor, Patrick'  
**Cc:** Bebe Kivitz  
**Subject:** RE: Constand v. Cosby

Pat

I understand that you are being attacked on all sides. Temple, the Court, and most likely your client but to say that I do not know who Judge Padova is, simply illustrates that you were not listening to our "conversation." As is evident by your behavior in the deposition, you have a tendency to attack without listening and certainly you are clearly upset.

I explained to you that we had no part in the release of the transcript and that we abided by the agreement. I did tell you, I do not understand your reference to Judge Padova and the subpoena.

I must caution you to reframe from defamatory remarks which have no basis in fact. We will respond to George's letter shortly, but you are not the one to be throwing stones here. I did think your client or someone in his "camp" orchestrated the release of the documents so that his denials would be made public but then if you didn't do it and we didn't do, than I suppose we need to look elsewhere.

Your conduct at the deposition isn't exactly stellar and now Temple is coming after you. All of this illustrates that ten years later, the agreement is unworkable. I genuinely regret that you are in this position, but it is an inappropriate response to attack us.

Dolores

**From:** Konopka, Joann [mailto:JKonopka@cozen.com] **On Behalf Of** O'Connor, Patrick  
**Sent:** Monday, July 20, 2015 9:49 AM  
**To:** dmt@tglawoffice.com  
**Subject:** Constand v. Cosby

Dolores,

This will confirm that I called you on 9:25am on Monday morning advising you unequivocally that the release of the deposition transcript by people whom you hired, i.e., the court reporting service of Kaplan Leaman and Wolfe is a total violation of the Stipulation and Confidentiality Agreement. You indicated that you were unaware of any provision that dealt with such a release and surmised that it was our law firm that somehow caused the release of the Cosby transcript. As you know, this is absurd. Just read the morning newspaper to confirm how absurd your comment is.

Finally, I indicated to you that the release of the deposition transcript is a direct violation of Judge Padova's Order which entered a stay with respect to any release of documents by you or your office in connection with this matter, which would have included the Cosby deposition transcript. You indicated you were unaware of who Padova was and I reminded you about the subpoena that was issued to you seeking release of all filed documents, including the Cosby deposition. It was pursuant to that subpoena that Judge Padova entered an order staying any requested materials pending further review.